

# EXHIBIT D

Bill Altongaga

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SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN DIEGO, EAST COUNTY REGIONAL CENTER

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MARY GIORDANO, individually and §  
on Behalf of the Estate of §  
Jacqueline Keith and other §  
qualified survivors, § Case No.  
§ 37-2011-00069363-CU-  
Plaintiffs, § PO-EC  
§  
vs. §  
§  
C.R. BARD, INC., a corporation, §  
BARD PERIPHERAL VASCULAR, INC., §  
a corporation, THOMAS §  
BRANNINGAN, M.D., an individual, §  
FRANKLIN KALMAR, M.D., an §  
individual, JULIE LAIDIG, M.D., §  
an individual, SHARP GROSSMONT §  
HOSPITAL, a corporation, SHARP §  
HEALTHCARE, a corporation, and §  
DOES 1 through 100 inclusive, §  
§  
Defendants. §  
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- - -  
October 22, 2013  
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Videotaped deposition of BILL ALTONAGA, held at  
Hilton Melbourne Rialto Place, 200 Rialto Place,  
Melbourne, Florida 32901, commencing at 9:34 a.m.,  
on the above date, before Uyen Mahaz, Registered  
Professional Reporter and Florida Professional  
Reporter.

- - -  
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1 your -- let's go to before you started your medical  
2 schooling in the Dominican Republic. Did you apply to  
3 any other medical school programs?

4 A. No, sir.

5 Q. The only one you applied to was in the  
6 Dominican Republic?

7 A. That's correct.

8 Q. Why did you not want to attempt to be accepted  
9 into a medical school program in the United States?

10 A. Quite frankly, I was young. My brother-in-law  
11 had gone to medical school or was also taking that path,  
12 and I followed his guidance and I thought that that was  
13 just the way. I came from a family that wasn't highly  
14 educated. My father and mother were not educated folks.  
15 They came from Cuba. And I really wasn't aware of all  
16 the options and how to go and pursue that type of  
17 education, and I thought that this was a way that was  
18 more feasible for me to do.

19 Q. All right. And before we move on, as it  
20 relates to having an M.D. degree --

21 A. Yes, sir.

22 Q. -- ophthalmology, as you've just alluded to, is  
23 a subspecialty within the medical field?

24 A. Correct.

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1 curriculum vitae?

2 A. No. I believe that my résumé begins with my  
3 education, both doctorate degrees, and then employment  
4 and activities after graduating from optometry school.

5 Q. All right. Why the delay between 1979 and 1986  
6 in deciding to attend optometry school?

7 A. Soul searching, trying to understand where I  
8 wanted to go professionally, what was available for me.  
9 Again, I didn't have a lot of guidance. I didn't have  
10 parents that said this is where you go to school, this  
11 is how it's going to be, you do your undergraduate, you  
12 go to graduate school. You know, so I had to fend for  
13 myself and figure out what I wanted to do.

14 Q. Okay. I'm just trying to get my mind around  
15 why somebody would attend medical school for four years,  
16 attempt to pass the foreign medical school examination,  
17 not pass it, and not try to do it again.

18 A. I don't think it's uncommon for people to  
19 change their majors. I think the average college  
20 student changes their major three or four times during  
21 their undergrad. So I had gone to medical school. I  
22 had gotten a taste of what it would be like to be a  
23 physician, and, you know, I wasn't sure that it was in  
24 my heart to practice medicine for the rest of my life.